REMARKS

Reconsideration of this application is respectfully requested.

The outstanding Office Action Summary includes checked boxes indicating that none of applicant's certified priority documents have yet been received. However, the Examiner is reminded that this case was filed via the PCT and that the Notification of Acceptance dated 10/28/99 already acknowledges receipt of applicant's certified priority document. Accordingly, the Examiner is respectfully requested to carefully review the file again and to confirm in writing that applicant's certified priority document has in fact already been received and made of record.

The Notification of Acceptance dated 10/28/99 also acknowledges receipt of the International Search Report and a copy of each reference cited therein. Accordingly, for the Examiner's convenience, a further copy of that Search Report and a Form PTO-1449 listing each such reference is attached. Return of a fully initialled copy of the Form PTO-1449 is respectfully requested. Under the circumstances, it is not believed that any additional IDS fee is required since the references were already timely supplied via the PCT and presumably already actually considered by the Examiner. However, if such fee is required, then it may be charged to our Account No. 14-1140.

A new more descriptive title has been effected by the above amendment.

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The noted informalities in the specification and Abstract have been corrected by the above amendment to the specification and the attached substitute ABSTRACT OF THE DISCLOSURE on a separate page.

The format of the claims has also been amended above so as to put them in more traditional US format.

Accordingly, all outstanding formal issues are now believed to have been resolved in the applicant's favor.

The rejection of claims 1-10 under 35 U.S.C. §103 as allegedly "obvious" based on the two-way combination of Ahn '409 in view of Turtle '948 is respectfully traversed.

For reasons noted below, neither of these references or any combination thereof considered arguendo can possibly make "obvious" even independent claims 1 and 7 -- let alone the dependent claims 2-6 and 8-10 which add yet further patentable distinction to the claimed combination -- especially when considered "as a whole" as each such claim must be under 35 U.S.C. §103.

Ahn describes a system for identifying documents relevant to a submitted search query and for presenting the search results as "hits" relating to one or more identified documents that were found to contain keywords from the search query. Presentation of the search results may include the facility to step through portions of document text, each

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portion containing a matching keyword from the search query. From a user's perspective, this appears to operate as a conventional search engine.

Ahn achieves his document search by means of intermediate trees and indexing tables that contain references to "searchable" terms identified from each of a stored set of documents. These tables enable the existence of a keyword, its location and frequency of occurrence within any particular document or group of documents to be determined without needing to access a stored document directly.

The Examiner cites Ahn's document index table 304 as an example of dividing a data set into sections according to pre-determined criteria. Ahn's document index table is a list of references to occurrences of "searchable" terms within the respective document. Presumably, the Examiner considers each searchable term to be a section in itself.

Clearly, if Ahn were to include a reference to EVERY word or term in the document in the document index table, then the table may be considered to be a disclosure of dividing the document into sections each of one word or term in length. However, Ahn does not appear to say whether or not ALL the words occurring in a document are <u>searchable</u> terms and therefore included in the respective index table. It would not be obvious to index every word in a respective document as the benefits of the table would be greatly undermined. However, without ALL the words in a document accounted for, the document index table 304 would not be a disclosure of "dividing" a document into sections as there would be parts missing.

There is therefore no apparent basis in Ahn for a disclosure of the feature of dividing a data set into sections according to predetermined criteria.

The Examiner suggests that in displaying hits at step 412, Ahn is disclosing compiling a customized summary of a data set. Ahn describes this feature at column 3, lines 52-60. Ahn displays "a portion of text in the document containing the first occurrence of the keyword". Then, "upon appropriate user command...the invention may display a portion of text in the document containing the next occurrence of the keyword". Each and every portion may be displayed separately upon command by the user, irrespective of its relative merit. Ahn does not disclose any form of <u>compilation</u> of portions of text and certainly does not suggest that such portions are selected with the purpose of providing a customized summary of the most relevant information in the document. Ahn is silent about the size and purpose of a "portion of text" being displayed, eing concerned only that it contains an occurrence of the matching keyword.

There is therefore no disclosure by Ahn of compiling a customized summary of a data set.

Turtle discloses a system for identifying concepts expressed within a natural language search query and for determining the probability that documents within a document collection satisfy the query. In particular, and as the Examiner has noted, Turtle's method includes calculating for each document a probability that the document meets the overall search query based upon a measure of the frequency of occurrence of

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each search query concept in the document. On the basis of these probability measures, Turtle ranks the documents.

However, Turtle does not apply his ranking technique below the document level. His only concern is whether or not a document contains information that might satisfy the search query. He is not concerned with compiling a summary of what a document has to say in relation to a particular concept. This aspect would be left for the user to determine on their own assessment having identified the document.

As with Ahn, Turtle does not teach beyond information searching, that is, beyond identifying documents that may contain information satisfying a search query. In both the Ahn and turtle systems, a user is left to determine what relevant information an identified document contains for him(her)self, knowing only tha there has been a match on some part of their search query in the document and, in Ahn's system, where in that document each match occurred.

By contrast, the present invention is directed to identifying and summarizing the information content of a document insofar as it is relevant to a predetermined topic (represented by a "target data item"). This is at least one step beyond both Ahn and Turtle. Adding a document summarizer according to the present invention would represent a self-contained addition to either of he prior art systems in providing a customized summary of documents identified by those respective systems. In that respect there is no overlap with the teaching of Ahn or Turtle and no combination of

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teaching from those documents would lead obviously to converting one or the other to

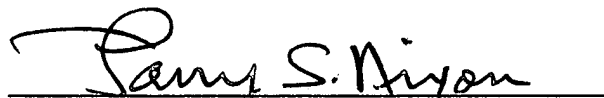operate as a customized summarizer as in the present invention.

The Examiner's attention is also drawn to new dependent claims 11-13 which,

except for the dependency, add additional recitations identical to those of claims 5, 6 and

10 to the overall combination being claimed in that particular chain of dependencies.

Accordingly, this entire application is now believed to be in allowable condition

and a formal Notice to that effect is respectfully solicited.

Respectfully submitted,

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